

**Table 5-7  
Drinking Water**

Comment (Location)	Response	EPA Response, January 13, 2014
<p>EPA-74: (Page ____)</p> <p>The proposed project is in the vicinity of public water supply systems, some small or very small. Systems in areas impacted by mining may require treatment to address contaminants that are in the water supplying the system. Historically, some public water supply systems in Mingo County near mining activity have required treatment to remove iron or manganese to address consumer concerns. Increased treatment costs can be a challenge for a small public water supply system that services small populations. We recommend that the analysis include a detailed discussion of the creeks supplying water to the public water supply systems and potential impacts to the public water supply systems in the project area particularly the Mingo County PSD – Naugatuck and the Williamson Utility Board as well as Mingo County PSD Chattaroy, Mingo County PSD Ragland District, Town of Delbarton, Mingo County PSD Pigeon Creek and Mingo County PSD Lick Creek.</p>	<p>The nearest public water supply intake is the Mingo County PSD's raw water intake along the Tug Fork River in Naugatuck, approximately 5.5 miles from the project area. There are 177 occupied dwellings that use the groundwater for domestic purposes from the 163 wells located within one-half 0.5 mile of the project area. Of these, there are nine located within 1,000 ft of the project area. These groundwater users appear to be obtaining water from sources located in the alluvial aquifers or valley floor fracture systems. These alluvial aquifers receive recharge from the underlying bedrock aquifers through the valley floor fracture system, as well as from infiltration of surface water. The bedrock aquifers are recharged via the interconnected valley wall fracture flow system, which intercepts infiltration and perched aquifers underlying the ridges and directs flow to the valley floors. These aquifers are stratigraphically located well below the proposed mineral removal areas, which are located along the ridgetops. In the event that any wells or water supplies presently being used in the areas adjacent to the proposed operation are impacted by proposed mining activity, such that water quantity or quality is adversely affected, CONSOL would be required to restore or replace the water supply to the affected water users in accordance with the requirements of SMCRA.</p>	<p>In addition to plans to restore or replace impacted water supplies, it would be beneficial if CONSOL participates in protecting local sources of drinking water – source water protection (SWP) - by coordinating with local and county municipalities to determine steps CONSOL can take to support local guidelines. For example, the Mingo County PSD Source Water Assessment Report (SWAP) (<a href="http://www.wvdhhr.org/oehs/eed/swap/get.cfm?id=3303029">http://www.wvdhhr.org/oehs/eed/swap/get.cfm?id=3303029</a>), describes a source water protection approach to protect the Tug Fork River intake (through use of planning and establishing a Watershed Delineation Area and a Zone of Critical Concern). A SWAP may be revised to address mining activity. The possibility of a release from potential contaminant sources is greatly reduced if best management practices (BMPs) are used. Although a public water supply intake may not be in the immediate project area, an unexpected spill or leak of a contaminant into a water body (such as the recent Elk River event in West Virginia when 4-methylcyclohexane methanol (MCHM) used to wash coal leaked out of a ruptured storage tank) could ultimately negatively impact sources of drinking water. In addition to isolating any toxic-producing materials from contact with surface or groundwater to prevent any potential contamination into surface or ground waters, implementing other pertinent SWP BMPs (such as when using storage tanks, consider proper placement away from vulnerable sources of drinking water, secondary containment and periodic inspection of storage tanks per existing regulations) will enable CONSOL to prevent impacts to drinking water sources instead of relying on replacement of a water supply. After the Elk River spill, replacement of water required FEMA funding.</p>
<p>EPA-75: (Page ____)</p> <p>Depending upon the</p>	<p>Section 4.2.7 of the FEIS addresses "Needs and Welfare of the People," one of the</p>	<p>CONSOL does not expect impacts to the groundwater sources of drinking water from land use activities, however, we recommend</p>

<p>amount of pollution generated by mining, how toxins are handled or transported, the depth of aquifer dewatering, etc., mining activity can potentially impact domestic water supplies. In 2004, the Delbarton Mining Company needed to replace water for many residents of Mingo County, West Virginia due to mining activities (Charleston Gazette 2004). Although the project proposal states that impacts to ground water are not expected, per Section 4.2.7, we recommend an analysis to discuss how any negative impacts to existing domestic water supplies due to land use activity in the project area will be addressed.</p>	<p>Public Interest Review factors considered by the Corps in association with the potential Section 404 permit authorization for the Buffalo Mountain Surface Mine. Ground water and drinking water are addressed in other sections of the FEIS. The proposed mining would occur well above the elevations of any potential aquifers providing drinking water sources to current residents near the mining area. The Buffalo Mountain Surface Mine would be required to comply with its NPDES permit, which would prevent any adverse impacts due to surface water discharges leaving the mining site. As indicated above, CONSOL would restore or replace any groundwater wells negatively affected by mining activities. CONSOL would also isolate any toxic-producing materials from contact with surface or groundwater to prevent any potential contamination into surface or ground waters. Also as indicated above, the proposed mining activities would be located above the elevation of any potential aquifers utilized by nearby residents.</p>	<p>CONSOL conduct prior to initiating mining baseline monitoring of pH, sulfate, iron, manganese, and aluminum in the domestic wells adjacent to the project area. Although pH, sulfate, aluminum, iron and manganese are secondary standards that impact taste or aesthetics of drinking water, well owners incur costs when treating water with these compounds. Pennsylvania has received an increase in calls from private well owners regarding elevated levels of aluminum, at times in coal mined areas. Baseline monitoring allows a private well owner to determine if nearby mining activity has impacted their well.</p>
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